

K&L GATES

April 27, 2020

Loly Tor
loly.tor@klgates.com

T +1 973 848 4026
F +1 973 848 4001

Via ECF

Hon. Karen Williams, U.S.M.J.
United States District Court for the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets, Room 2010
Camden, New Jersey 08101

Re: *Gorczynski v. Electrolux Home Products, Inc., et al.*
Case No. 1:18-cv-10661-RMB-AMD

Dear Judge Williams:

We represent Defendant Electrolux Home Products, Inc. ("Electrolux"). We write to respectfully request that the Court enter the enclosed proposed Fifth Amended Scheduling Order, which extends the remaining briefing deadlines by one week. Plaintiff's counsel has consented to this request.

Pursuant to the Fourth Amended Scheduling Order (ECF No. 103), Plaintiff filed his Motion for Class Certification on March 27, 2020, and Electrolux filed its *Daubert* motions on April 24, 2020. The remaining briefing schedule is as follows:

1. Defendant's opposition to class certification due **May 1, 2020**;
2. Plaintiff shall serve his reply brief in support of class certification, his oppositions to any *Daubert* motions and any affirmative *Daubert* motions by **May 22, 2020**;
3. Defendants shall serve oppositions to any *Daubert* motion advanced by Plaintiff by **June 12, 2020**, and replies in support of their *Daubert* motions by **June 19, 2020**; and
4. Plaintiff shall serve his reply in support of any *Daubert* motions by **June 26, 2020**.

Electrolux respectfully requests a one-week extension of the foregoing deadlines to accommodate the challenges we have faced while working remotely. As such, we respectfully request a one-week extension to the remaining briefing schedule, as shown below:

1. Defendant's opposition to class certification due **May 8, 2020**;

K&L GATES LLP
ONE NEWARK CENTER TENTH FLOOR NEWARK NJ 07102
T +1 973 848 4000 F +1 973 848 4001 klgates.com

Anthony P. La Rocco, Administrative Partner, New Jersey
304758488 v1

2. Plaintiff shall serve his reply brief in support of class certification, his oppositions to any *Daubert* motions and any affirmative *Daubert* motions by **May 29, 2020**;
3. Defendants shall serve oppositions to any *Daubert* motion advanced by Plaintiff by **June 19, 2020**, and replies in support of their *Daubert* motions by **June 26, 2020**; and
4. Plaintiff shall serve his reply in support of any *Daubert* motions by **July 7, 2020**.

As no hearing or trial dates have been set, the one-week extension will not affect any other deadlines. Do not hesitate to contact me with any questions. We appreciate Your Honor's attention to this request.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Loly G. Tor".

Loly G. Tor